

POLICY ON EQUALITY, NON-DISCRIMINATION AND RESPECT FOR DIVERSITY

Grupo Negratin recognizes as strategic objectives in the development of its activity: equality, non-discrimination and respect for diversity, in relation to all persons linked to the Group's Compliance Model.

These objectives constitute not only a fundamental human right but also represent a necessary and essential basis for the development of all people, with the aim of ensuring their full inclusion and effective participation in all areas of Grupo Negratin.

This Policy is based on the principles and values established in the Group's Code of Ethics and Conduct.

For these purposes, Negratin Global Services S.L. has approved this Policy of equality, non-discrimination and respect for diversity, which has the following content:

FIRST.- Purpose.

The purpose of this Policy is to establish equal opportunities, non-discrimination and respect for diversity, it is to achieve a favorable environment where respect among people prevails, and at the same time, to promote awareness, training and inclusion on these issues, in accordance with the requirements arising from the application of human rights, and the principles of equality and non-discrimination.

Consequently, Grupo Negratin does not tolerate the existence of any discrimination based on race, religion, nationality, disability, sexual orientation, gender, marital status, gender identity, age or any other personal or social characteristic, protected by treaties or international regulations, the law at all times applicable, in accordance with the values, criteria and principles established by Grupo Negratin.

SECOND. Scope of application

This Policy applies to all employees of Grupo Negratin. Any person who is part of the Group is responsible for promoting equality, diversity and inclusion in the development of their work and professional activity in their workplace.

THIRD. Basic objectives

1. Grupo Negratin recognizes that people are unique because of their differences and similarities, and encourages utmost respect and understanding for others. Inclusion is favored by the creation of working and professional environment in which each person can achieve his or her goals and develop. Therefore, within the Group's framework of action, an atmosphere of understanding and acceptance is promoted in which each person can develop every day, in which all employees have the responsibility to treat other employees and other people linked to the Group's Compliance Model with the utmost respect, maintaining, in any case, a zero tolerance policy against all types of discrimination.

2. The main objectives of this policy are:

- a) To attract and retain profiles that can be diverse, enriching the framework of activity for all positions within the Group.
- b) To facilitate an inclusive work environment that ensures that all Negratin's people feel accepted and integrated.
- c) To promote equal opportunities in all areas within Negratin.
- d) To promote collaboration and respectful communication among all employees.

FOURTH: Basic principles of action.

In order to achieve these objectives, Negratin assumes and promotes the following basic principles of action:

a) Negratin assumes the firm commitment to promote the equality of all persons linked to its Compliance Model, through the design and application of protocols and mechanisms of action, adopting those measures that guarantee respectful and non-discriminatory attention and treatment, eliminating any form, practice or procedure that generates discriminatory effects towards all the Group's employees without any distinction whatsoever.

In this regard, Negratin will develop procedures and implement appropriate training programs to achieve these objectives.

b) To promote gender equality within the Group in terms of access to employment, training, professional promotion and working conditions, as a expression of the social and cultural reality and, in particular:

1. To reinforce Negratin's commitment to gender equality both in the organization and in society and to raise awareness of this issue in both areas.
2. To guarantee the principle of equal opportunities in the professional development of both genders within the Group, removing obstacles that may hinder or limit their careers due to gender.
3. To analyze affirmative action measures to correct any inequalities that may arise and to promote the access of women to positions of responsibility in which they have little or no representation.
4. To promote mechanisms and procedures for the selection and professional development that facilitate the presence of women with the necessary qualifications in all areas of the organization where they are underrepresented, including the implementation of specific training and career development programs for women.

4. To strive for a balanced representation in the different decision-making bodies and levels, ensuring that both genders participate under equal opportunity conditions in all the Group's consultation and decision-making areas.
 5. To promote working conditions from a gender perspective, enabling the reconciliation of personal, work and family life for all professionals working in the Group, ensuring the elimination of all gender-based discrimination.
- c) To favor and promote social inclusion of all people, especially those with different abilities.
- d) To respect diversity in all areas, promoting non-discrimination on grounds of race, color, age, sex, marital status, ideology, political opinions, nationality, religion, sexual orientation or any other personal, physical or social condition among its professionals and all persons who relate in one way or another with the Group.
- e) To guarantee the quality of employment, promoting the maintenance of stable and quality jobs, with occupational contents that guarantee a continuous improvement of the skills and personal and professional competencies of all the people linked to Negratin.
- f) To develop the principle of equal opportunity. This principle, compliance with which is one of the essential pillars of professional development, entails a commitment to practice and demonstrate equitable treatment that fosters the personal and professional advancement of the Group's team in the following areas:
1. Promotion, professional development and compensation: valuing the knowledge and skills necessary to perform the job.
 2. Hiring: not to establish salary differences based on personal, gender, physical or social conditions such as sex, race, marital status or ideology, political opinions, nationality, religion or any other personal, physical or social condition.
 3. Recruitment and selection: choosing the best professionals by means of a selection based on the merit and capabilities of the candidates.
 4. Training: ensuring education and training of each professional in the knowledge and skills required for the proper development of their work.
 5. Support for workers with disabilities, promoting their effective employment.
 6. Promoting transparent communication, encouraging innovation and granting the necessary autonomy to professionals in the exercise of their functions.
- g) Implement work-life balance measures that favor respect for the personal and family life of its professionals and facilitate a better balance between work and family life of both genders, highlighting, in particular, those directed to encourage respect for the resting time of its professionals and to avoid, whenever possible, professional communications outside working hours.

- h) To favor the contracting of those suppliers that have internal measures in terms of conciliation, non-discrimination and inclusion, as well as gender equality for their employees complying with the provisions of this Policy on equality, non-discrimination and respect for diversity.
- i) Eradicate the use of discriminatory language in any type of corporate, internal or external communication.
- j) And, the development of any other measures aimed at the development of the above objectives.

FIFTH.- Policy monitoring

The Compliance Committee shall be responsible for monitoring this Policy. The monitoring of the Policy includes (i) its implementation, (ii) procedures for reporting irregular activities, (iii) periodic reviews of the effectiveness of employee training, (iv) certifications, reports and records as appropriate and (v) review of the compliance of this Group Policy with applicable laws.

The Regulatory Compliance Committee will carry out the necessary actions in relation to the allegations or complaints reported regarding those acts that are considered contrary to equality, non-discrimination and respect for diversity, with special reference to gender equality, leaving a documentary record of them. As a result of such actions, Negratin will determine the actions to be taken, including possible disciplinary actions against employees, the termination of business relationships with third parties and/or, if necessary, reporting to the competent authorities.

SIXTH. Obligation to report annually to the Board of Directors of Grupo Negratin.

The Regulatory Compliance Committee will report annually to Negratin's Board of Directors the results of these investigations, as well as the implementation and continuous improvement of this Policy.

Compliance with ethical rules and standards is a Group-wide commitment and a strategic objective. Therefore, all Group employees must know and respect the contents of this Policy. The same applies to third parties who are linked to the Group's Compliance Model, who are expected to conduct themselves in line with it.

SEVENTH. Preparation and implementation of equality plans.

Negratin will periodically draw up equality plans with trade union representatives to ensure that such equality, whether gender equality or with a general projection, is effective within the framework of actions carried out by Negratin.

EIGHTH. Policy update and revision

This Policy will be reviewed and updated to adjust it to the changes that occur in the Group, ensuring its effective implementation at all times.

This policy of equality, non-discrimination and respect for diversity was approved by the Board of Directors of Negratín Global Services S.L. at its meeting held on October 25, 2023 and came into force upon its approval.